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Admitted to Practice Law
in the State of New York

March 6, 2023

Via ECF

Magistrate Lee G. Dunst, USMJ
United States District Court, EDNY
100 Federal Plaza
Central Islip, NY 11717

Re: Barahona et al. v. Paradise Tree Service & Landscape Corp. et al.
Case No.: 2:21-cv-05400 (GRB)(LGD)
Joint Letter - Settlement Conference rescheduled from March 7, 2023 to
April 10, 2023 at 2:00 p.m.

Dear Magistrate Dunst:

Regarding the above matter and pursuant to your Order dated February 16, 2023, please allow this joint letter from Plaintiffs' and Defendants' counsel to confirm that all parties and their counsel remain prepared to attend, and participate, in person, in a productive settlement conference on April 10, 2023 at 2:00 p.m.

In addition, on consent of all parties, we respectfully request that all deadlines for discovery, pleadings and motions, be extended for forty-five (45) days after April 10, 2023 to the new date of May 25, 2023. Thank you.

Respectfully submitted,



Glenn J. Ingoglia, Esq.
Counsel for Defendants

c.c.: Via ECF
Steven Moser, Esq.
Counsel for Plaintiffs